

Before the
Federal Communications Commission
Washington D.C. 20554

In The Matter of ET Docket No. 00-258, RM-9920, RM-9911.

**Reply Comments of
Self Help for Hard of Hearing People, Inc. (SHHH)**

To the Commissioners of the FCC:

These Reply Comments are submitted after the effective deadline of March 9, 2001. We apologize for failing to submit these comments previously, but we recently became aware of this proceeding, and feel that it is critical that we respond.

Introduction

We appreciate this opportunity to submit these Reply Comments on behalf of Self Help for Hard of Hearing People, Inc. (SHHH) the largest consumer organization in the United States devoted to the rights and interests of people with hearing loss. On behalf of our 11,000 members across the United States, and on behalf of people with hearing loss everywhere, we submit these Reply Comments for your consideration.

Issues for Consideration

In regard to this Docket about new advanced wireless services being offered to the public on allocation of spectrum for a wide range of voice, data and broadband services, commonly referred to as third generation or 3G wireless services, SHHH wishes to raise the following questions concerning the potential

effect on technologies used by people with hearing and other disabilities.

Since this proceeding is exploring the types of services that the technologies for broadband Personal Communications Systems (PCS), Specialized Mobile Radio (SMR) and five other frequencies would support, we ask that the issue of compatibility of these services with digital and other commonly used hearing aids and cochlear implants be taken into consideration as these services are developed.

For instance, we suggest that as these wireless advanced services standards are developed, the Commission should examine the question of whether or not these frequencies for voice transmission services interfere with hearing aids.

As first generation wireless systems evolve to second and third generation systems, there are likely to be hearing aid compatibility issues. Given that in the first generation of wireless systems there continue to be significant problems with the compatibility of hearing aids and these devices, we cannot overemphasize the importance of considering the issue of interference as the new generations are in the process of development. There may also be technological compatibility issues with cochlear implants and other assistive listening devices. Similarly, if and when these spectra begin to be deployed for advanced wireless services, the FCC should examine the issue of whether TTY compatibility and 911 and E911 access for people with disabilities who use specialized equipment or devices is affected. Similarly, for any video transmission over third generation networks, such as usages involving Instructional Television Fixed Services (ITFS), there may be open or closed captioning issues that should be raised.

We would like the FCC to explore these topics as the rulemaking proceeds and to keep open the discussion in regard to disability access topics if and when such spectrum allocations are used.

SHHH appreciates the opportunity to submit these reply comments on behalf of all people with hearing loss.

Respectfully submitted,

A handwritten signature in black ink that reads "Timothy P. Creagan". The script is fluid and cursive, with the first name being the most prominent.

Timothy P. Creagan
Public Policy Program Coordinator
Self Help For Hard Of Hearing People
7910 Woodmont Avenue, Suite 1200
Bethesda, MD 20814
(301) 657-2248 (V) 2249 (TTY)
Creagan@shhh.org